

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Ryan Timmons,

Debtor.

Chapter 13
Case No. 23-13778-amc

Motion to Reinstate Case

Debtor Ryan Timmons, by his attorney, moves this Court as follows:

1. This case was dismissed on April 25, 2024, on motion of the Trustee for failure to make plan payments.
2. When the case was dismissed, the Debtor's plan payments were deficient in the amount of \$5,388.00.
3. On May 1, 2024, the Debtor mailed payment to the Trustee in the form of a certified check made payable to the Trustee in the amount of \$5,388.00.
4. Because the deficiency that gave rise to the case's dismissal has been cured, the Debtor requests that this case be reinstated.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: May 1, 2024

CIBIK LAW, P.C.
Attorney for Debtor

By: 
Mike Assad (#330937)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
help@cibiklaw.com